

EXHIBIT 4

Revised Deposition Coordination Proposal—NY Class + Newspaper Cases

1. All 30(b)(1) depositions noticed in the New York cases (regardless of who noticed them) shall be coordinated, automatically cross-noticed, and may be used across all of the New York cases in accordance with Rule 32. The deposition hours shall be counted against all taking parties who participate in accordance with their time spent on the record examining the witness.
2. If a 30(b)(1) deposition of an OAI-affiliated witness is noticed in the California consolidated class cases, it will also be automatically cross-noticed in all New York cases. The New York Plaintiffs will coordinate and use their time after the California Plaintiffs have exhausted their time. The deposition hours shall be counted against all taking parties who participate in accordance with their time on the record. OAI will use reasonable efforts to confirm availability of NY Plaintiffs before confirming a deposition date in the California action.
3. In order to effectuate coordination of 30(b)(6) witness testimony, all NY Class Plaintiffs and NY News Plaintiffs shall each serve consolidated and comprehensive 30(b)(6) Notices on OAI by January 30, 2025. OAI shall designate 30(b)(6) witnesses for single sittings across all CA and NY cases, and to the extent such witnesses are also 30(b)(1) witnesses, they will testify in all capacities at the same time.
4. Microsoft is not a party in the California consolidated class actions but Plaintiffs may seek to take non-party depositions of Microsoft in those cases. If so, the same procedures as in paragraphs 2 and 3 shall apply to such witnesses.
5. Time limits:

	Class Cases	News Cases
Depositions Taken by Plaintiffs	140 hours, no more than 70 hours of one Defendant	140 hours, no more than 70 hours of one Defendant
Depositions Taken by Defendants	120 hours of Class Plaintiffs	210 hours, no more than 70 hours of Times, 70 hours of Daily News Plaintiffs, 70 hours of CIR

6. Additional limits:
 - a. 7 hours (all NY cases) for Apex witnesses
 - b. 9 hours for individuals noticed in Class & News cases as 30(b)(1) only
 - c. 12 hours for individuals noticed in Class & News cases as both 30(b)(1) and 30(b)(6)

- d. Non-party witnesses affiliated with a party (e.g., former employee) count against the limits applicable to that party.